

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA**

<b>UNITED STATES OF AMERICA</b>	*	<b>CRIMINAL DOCKET NO.: 07-273</b>
<b>VERSUS</b>	*	<b>SECTION: "D" (4)</b>
<b>ISAAC JOHNUS BOLTON</b>	*	
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**FACTUAL BASIS**

If this case were to proceed to trial, the Government would prove the Defendant guilty beyond a reasonable doubt of Count One of the Indictment. In Count One, the Defendant, **ISAAC JOHNUS BOLTON**, is charged with knowingly and intentionally combining, conspiring, confederating, and agreeing with one or more persons to distribute and possess with the intent to distribute five (5) or more kilograms of a mixture or substance containing a detectable amount of cocaine hydrochloride, a Schedule II narcotic drug controlled substance; in violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(A)(ii). The Government would establish the following examples of **BOLTON**'s involvement in the conspiracy through reliable and competent evidence:

1.) Beginning at a time unknown, but prior to July 25, 2006, and continuing until on or about February 19, 2007, in the Eastern District of Louisiana, **BOLTON** participated in a drug distribution organization that conspired to obtain and distribute five (5) or more kilograms of cocaine hydrochloride (“cocaine”), fifty (50) grams or more of cocaine base (“crack cocaine”), and over one thousand (1000) pounds of marijuana.<sup>1</sup> This organization utilized cocaine and marijuana initially brought into Louisiana from Texas by **BOLTON**’s co-conspirator, Gabriel Juron Bolden.

2.) During the time of the conspiracy charged in the Indictment, **BOLTON** received cocaine and marijuana from his co-conspirators, Gabriel Juron Bolden and Bruce Carter, Jr., and **BOLTON** used various telephone facilities to coordinate illegal drug activities with his co-conspirators. **BOLTON**’s drug-related conversations with Carter were monitored and recorded by members of the Federal Bureau of Investigation (“FBI”) through two (2) court-authorized wire intercepts of a telephone facility used by Carter. During many of these conversations, **BOLTON** used coded language – including words or phrases such as “spinach” to indicate marijuana, and “g” and “pound with cheese” to indicate quantities of one gram and one pound, respectively – in order to conceal the true nature of the calls.

3.) **BOLTON** typically used a telephone with the number (985) 201-5220. Through the course of investigation, that telephone number was linked to **BOLTON** by the following means: his own self-identification during recorded conversations, identifications by Carter and Bolden, and **BOLTON**’s providing said telephone number to Louisiana Parole Officer Justin Allen. During many conversations, **BOLTON** used the nicknames “Ike,” “Ike-Dog,” and “Cut-Dog.”

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<sup>1</sup> During the above-mentioned time period, **BOLTON** was on parole and supervised by an officer with the State of Louisiana Department of Probation and Parole.

4.) On December 6, 2006, at approximately 7:45 p.m., **BOLTON** called Carter and ordered “one g.” Approximately three minutes later, Carter called **BOLTON**, and they agreed to meet at “Cooperville” – a location later discovered by law enforcement agents and officers to be in the Alton area in Slidell, Louisiana near Carter’s residence – in order to complete the transaction for one gram of crack cocaine.

5.) The following day on December 7, 2006, at approximately 7:56 p.m., a telephone call was captured during which **BOLTON** ordered “one g.” Approximately twenty minutes later, Carter called **BOLTON** and told him to go back to Cooperville to complete the transaction for another gram of crack cocaine.

6.) On December 8, 2006, at approximately 10:48 p.m., **BOLTON** called Carter and ordered another gram of crack cocaine. **BOLTON** was directed to travel to Carter’s residence to complete that transaction.

7.) On December 10, 2006, two calls were placed between **BOLTON** and Carter during which another one-gram crack cocaine deal was arranged to take place at the Cooperville location.

8.) On December 12, 2006, through a series of five calls between **BOLTON** and Carter, another drug deal was facilitated. The exact terms of that deal were not specified.

9.) On January 5, 2007, through a series of calls between **BOLTON** and Carter, **BOLTON** ordered another gram of crack cocaine. During the last call, Carter advised **BOLTON** that he was ready and advised **BOLTON** to come to Carter’s residence to complete the drug deal.

10.) During two calls on January 10, 2007, **BOLTON** ordered crack cocaine and one pound of marijuana. During the first call, **BOLTON** confirmed he wanted the “hard stuff,” meaning crack cocaine. Approximately twenty-five minutes later, **BOLTON** asked for, and was granted

permission to travel to Carter's residence to complete the drug deal.

11.) On January 12, 2007, **BOLTON** called Carter and ordered one gram of crack cocaine. Carter responded that he did not have it, but should have it Saturday or Sunday. On January 14, 2007, **BOLTON** called Carter and ordered two grams of crack cocaine. Carter advised he would bring them to **BOLTON**. Approximately fourteen minutes later, **BOLTON** called Carter, and Carter told **BOLTON** that he was on his way.

12.) The investigation determined that while Carter and Bolden had their own subordinate dealers, it was not uncommon for Carter and Bolden to sell drugs to the other's customers. **BOLTON** was recorded in conspiratorial conversations taking place on the telephone facility used by Gabriel Bolden. On January 27 and 31, 2007, **BOLTON** was recorded arranging to meet with Bolden for the purpose of purchasing cocaine. Other conversations were recorded between Bolden and Carter that confirmed **BOLTON**'s drug dealing activities.

13.) Title III wire intercepts, as well as interviews with Carter and other co-conspirators, indicated that the organization obtained between fifteen (15) and fifty (50) kilograms of cocaine hydrochloride, over fifty (50) grams of cocaine base, and over one thousand (1000) pounds of marijuana during the life of the conspiracy. The Government and **BOLTON** agree and stipulate that for sentencing purposes, the amounts the Government could prove that **BOLTON** distributed or possessed with the intent to distribute are: two and one-quarter ( $2\frac{1}{4}$ ) ounces (or approximately sixty-four (64) grams) of cocaine hydrochloride, twenty-eight (28) grams of cocaine base, and one (1) pound of marijuana.

14.) As indicated above, the FBI utilized audio surveillance techniques which captured **BOLTON** and other co-conspirators communicating over various telephones. Intercepted

conversations between **BOLTON**, Carter, and Bolden, and between other co-conspirators would be introduced as evidence, as well as the testimony of cooperating conspirators and investigators.

15.) An employee of the St. Tammany Parish Sheriff's Office analyzed the substances obtained during this investigation, and that analysis determined that they did indeed contain cocaine, a Schedule II narcotic drug controlled substance, and marijuana, a Schedule I controlled substance.

**ISAAC JOHNUS BOLTON** acknowledges that the above-referenced conduct constitutes a knowing violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(A)(ii).

**APPROVED AND ACCEPTED:**

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**ISAAC JOHNUS BOLTON** (date)  
Defendant

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**MICHAEL G. RIEHLMANN** (date)  
Attorney for Defendant

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**R. CHRISTOPHER COX III** (date)  
Assistant United States Attorney